

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEWYORK

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JOSE SUMBA (AND WIFE, MARIA SUMBA)

Case No.:  
21 MC 102 (AKH)

Plaintiffs,

Docket No.: 07CV1709

-against-

AMERICAN EXPRESS BANK, LTD., ET AL.,

NOTICE OF ADOPTION OF  
ANSWER TO MASTER  
COMPLAINT

Defendant.

See Rider Attached.

Jury Trial Demanded

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Defendants, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW EAST CONDOMINIUM, by their attorneys, CALLAN, KOSTER, BRADY & BRENNAN, LLP, adopts its Answer to the Master Complaint served by the answering defendants in 21 MC 102 (AKH) as its answer to the allegations set forth in the Complaint by Adoption (Check-Off Complaint). Pursuant to Case Management Order No. 4, this adoption of answer to the Master Complaint is deemed to deny the allegations of the Check-Off Complaint in this case. To the extent that defendants' Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above caption matter, defendants deny knowledge or information sufficient to form a belief as to the truth of such specific allegations.

Wherefore, the defendants demand judgment dismissing the above captioned action as against each of them, together with their costs and disbursements.

Dated: New York, New York  
September 12, 2007

Yours etc.,

CALLAN, KOSTER,  
BRADY & BRENNAN, LLP  
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CONDOMINIUM, HUDSON VIEW EAST  
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TO: WORBY GRONER & NAPOLI BERN, LLP  
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**RIDER**

JOSE SUMBA AND MARIA SUMBA,

Plaintiffs,

- against -

AMERICAN EXPRESS BANK, LTD,  
AMERICAN EXPRESS COMPANY, AMERICAN  
EXPRESS TRAVEL RELATED SERVICES  
COMPANY, INC., BATTERY PARK CITY  
AUTHORITY, BFP TOWER C CO. LLC., BFP  
TOWER C MM LLC., BLACKMON-MOORING-  
STEAMATIC CATASTOPHE, INC. D/B/A BMS  
CAT, BOARD OF MANAGERS OF THE  
HUDSON VIEW EAST CONDOMINIUM,  
CHASE MANHATTAN BANK, HILLMAN  
ENVIRONMENTAL GROUP, LLC., HUDSON  
VIEW EAST CONDOMINIUM, HUDSON VIEW  
TOWERS ASSOCIATES, LEHMAN BROTHERS  
HOLDINGS INC., LEHMAN BROTHERS, INC.,  
LEHMAN COMMERCIAL PAPER, INC.,  
MCCLIER CORPORATION, R Y  
MANAGEMENT CO., INC., RY  
MANAGEMENT, TRAMMELL CROW  
COMPANY, TRAMMELL CROW CORPORATE  
SERVICES, INC., VERIZON  
COMMUNICATIONS, INC., VERIZON NEW  
YORK, INC, VERIZON PROPERTIES, INC.,  
WFP RETAIL CO. G.P. CORP., AND WFP  
RETAIL CO. L.P., ET AL

Defendants.

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